

### **REMARKS/ARGUMENTS**

Claims 2-24 are amended. Claims 1-24 are pending. The amendments to the claims are for clarification purposes only, curing minor informalities incurred through translation errors and/or making minor grammatical changes to the claims. The amendments are not intended to narrow the scope of the claims in any way.

Claims 2-10 and 12-24 are objected to as including informalities. These claims are amended in light of the remarks of Office Action to more clearly define the invention.

Reconsideration of the objection to claims 2-10 and 12-24 is respectfully requested.

Claims 1 and 11 are rejected under 35 U.S.C. § 103 as being unpatentable over U.S. Patent No. 6,775,249 (“Gibson”) in view of U.S. Publication No. 2002/0164983 to Raviv et al. (“Raviv”).

Claims 2-10 and 12-24 are rejected under 35 U.S.C. § 103 as being unpatentable over Gibson in view of Raviv and further in view of U.S. Patent Publication 2003/0211845 to Lohtia et al. (“Lohtia”).

Reconsideration of the application in light of the remarks below is respectfully requested.

The present invention provides a system which implements a dialing error notification service for visiting subscribers in a VPLMN relating to international roaming. That is, when such subscriber moves to a mobile network that is not his/her origin mobile network. It is respectfully asserted that none of the prior art, even in combination, shows such a system.

The primary reference to Gibson relates to fixed networks. See, e.g., Gibson, column 1, lines 6-9; column 12, lines 35-43. In contrast, independent claims 1 and 11 clearly recite a “mobile telephone network”, a “home mobile telephony network” and “visited mobile telephony network”. Gibson and the present invention thus clearly relate to distinct fields with different problems to be solved using different possible solutions.

Moreover, claims 1 and 11 recite determining an identity based on an “International Mobile Subscriber Identity”. The Office Action points to Column 4, lines 46-58 of Gibson as showing this limitation. However, this section of Gibson discusses determining a CLI or calling line identity. The International Mobile Subscriber Identity (IMSI) is an internal number unique for each subscriber in a mobile network. It may be used to identify both the home country and

the home mobile network. The IMSI is not dialable. The CLI relates to fixed networks and does not have these properties. Therefore, the CLI in Gibson cannot be said to correspond to the claimed IMSI.

Further, as Gibson relates to a fixed network, and Raviv relates to a mobile network, a person of ordinary skill in the art would not be motivated to combine the two references as they generally do not even lie in the same field.

Reconsideration of the rejection of claims 1-24 under 35 U.S.C. § 103 is respectfully requested in light of the remarks above.

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450, on April 11, 2006:

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Respectfully submitted,

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